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October 24, 2019

Katelyn M. Hartford, Esq.  
Asst. United States Attorney  
100 State Street, Suite 500  
Rochester, New York 14614

Re: U.S v. Xavier Torres

Dear Ms. Hartford:

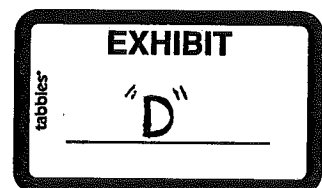
You had recently indicated in our phone conversation that the government claims Mr. Torres was involved in various shootings in the area. As I pointed out to you, our review of the data provided through the court approved data service did not provide any records of any of these alleged events. Moreover, there are some FIF and CR reports involving the subject premises that have not been located to date.

In order for my office to meaningfully represent Mr. Torres and properly advise him of his rights and options at this critical stage of the pre-trial proceedings, I must have the opportunity to review and inspect any physical evidence, reports, or other records supporting your claims against Mr. Torres. Please let me know of a date when I can come to your office and review said documents, pertinent to the other acts evidence which you are referencing. This letter is being written with the hope that we can avoid motion practice relative to this particular discovery issue.

There are some specific CR/FIF reports that we have not acquired through the database search:

- A. FIF #15-164993-6/29/15 call for service.
- B. FIF #15-253801-9/23/15 traffic stop near 11 Burbank Street.
- C. FIF #15-234783-9/4/15 traffic stop-11-14 Burbank Street area.
- D. CR#16-179570-7/13/16 incident.
- E. CR #16-213156-Brandon Smith stop.
- F. Report from Concerned Citizen -week of 2/19/18.
- G. 3/31/16 reports regarding shootings of Caesar Lopez Quinones and Michael Bruno.
- H. 1/20/16 reports regarding shooting of Luis Garcia Pizzaro.
- I. CR#164993-6/29/15 incident-6 Burbank Street.
- J. CR#267279-10/8/15 incident-6 Burbank Street.

PLEASE NOTE NEW ADDRESS



K. CR#236419-9/6/15 incident-11 Burbank Street.

L. CR#238970-9/8/15 incident-11 Burbank Street.

M. CR#266167-10/7/15 incident-11 Burbank Street.

N. CR#274383-10/15/15 incident-11 Burbank Street.

O. CR#295213-11/7/15 incident-11 Burbank Street.

P. Body cam videos of July 30, 2015 search.

Q. Body cam videos of February 6, 2016 motor vehicle stop and arrest.

Thank you for your consideration. I look forward to your reply.

Very truly yours,

A handwritten signature in black ink, reading "Maurice Verrillo". The signature is written in a cursive, flowing style.

Maurice J. Verrillo